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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>In re:</b>	)	Chapter 11
	)	
<b>PURDUE PHARMA, L.P., et al.<sup>1</sup></b>	)	Case No. 19-23649 (RDD)
	)	
<b>Debtors.</b>	)	(Jointly Administered)
	)	

**THE AD HOC GROUP OF NON-CONSENTING STATES'  
STATEMENT IN SUPPORT OF DEBTORS' MOTION  
TO APPROVE STIPULATION GRANTING JOINT STANDING  
TO PROSECUTE CLAIMS AND CAUSES OF ACTION RELATED TO THE  
DEBTORS' INSURANCE COVERAGE TO (1) THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS AND (2) THE AD HOC COMMITTEE OF  
GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS**

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<sup>1</sup> The debtors in these chapter 11 cases along with the last four digits of their federal tax identification numbers, are Purdue Pharma Manufacturing L.P. (3821), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies K.P. (1868), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (6166), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014) (collectively, the "Debtors" or "Purdue"). The Debtors' principal offices are at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

To the Honorable Robert D. Drain, United States Bankruptcy Judge:

The Ad Hoc Group of Non-Consenting States (the “Non-Consenting States”)<sup>2</sup> submits this Statement (the “Statement”) in support of the Debtors’ motion (the “Motion”)<sup>3</sup> seeking approval of a stipulation (the “Stipulation”) granting the Official Committee of Unsecured Creditors (“Official Committee”) and the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (“Ad Hoc Committee”) standing with the Debtors to assert, litigate and resolve the Debtors’ Insurance Causes of Action and respectfully states as follows:

1. All creditor parties in interest and the Debtors share a common desire, interest and imperative to assert, litigate and resolve the Debtors’ Insurance Causes of Action, to monetize the Debtors’ Insurance for the benefit of the Debtors’ creditors to the fullest extent, and to do all of this in a way that is most effective and efficient, not only now, but in the future when an estate representative is likely to be appointed for these purposes, as the Debtors will cease to exist as entities when a plan of reorganization goes effective based on their court-approved settlement with the United States Department of Justice.

2. Conferring joint standing on the Official Committee and the Ad Hoc Committee not only insures that representatives of parties with these common interests are working together with the Debtors to advance these goals, but it does so in a way that assures that lawyers, in whom the Non-Consenting States have confidence because of their successes in obtaining fair value for creditors from debtors’ insurance policies in bankruptcy cases, are at the forefront of the effort, while permitting the Debtors to retain the Debtors’ Insurance Causes of Action.

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<sup>2</sup> California, Colorado, Connecticut, Delaware, the District of Columbia, Hawaii, Idaho, Illinois, Iowa, Maine, Maryland, Massachusetts, Minnesota, Nevada, New Hampshire, New Jersey, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, Vermont, Virginia, Washington, and Wisconsin.

<sup>3</sup> Docket No. 2227. Capitalized terms used in this Statement that are not otherwise defined have the meanings ascribed to them in the Motion.

3. In addition, by specifically recognizing the common interest among the estate's creditors, the Motion and Stipulation establish the proper dynamic for the Non-Consenting States to obtain appropriate and timely access to strategy and analysis as the Debtors' Insurance Causes of Action are asserted, litigated and resolved, further enhancing the efficiency of the effort.

4. Finally, there is no reason to delay this joint effort, which has the up-front support of the Non-Consenting States, the Debtors, the Official Committee and the Ad Hoc Committee. Getting as much done as possible to assert, litigate and resolve the Debtors' Insurance Causes of Action before a plan of reorganization is filed and confirmed will benefit all creditors. Waiting to do so does not.

### **CONCLUSION**

For these reasons, the Court should grant the Motion.

Dated: January 16, 2021  
New York, New York

Respectfully submitted,  
PILLSBURY WINTHROP SHAW PITTMAN LLP

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**CERTIFICATE OF SERVICE**

I, Andrew V. Alfano, hereby certify that, on January 16, 2021, I caused true and correct copies of the foregoing document to be served (i) by the Court's Case Management/Electronic Case File (CM/ECF) System to all parties who are deemed to have consented to electronic service; (ii) by email upon the parties who provided email addresses set forth in the Master Service List maintained by the Debtors in respect of these chapter 11 cases; and (iii) by email upon the chambers of the Honorable Judge Robert D. Drain ([rdd.Chambers@nysb.uscourts.gov](mailto:rdd.Chambers@nysb.uscourts.gov)) and the Office of the United States Trustee for the Southern District of New York (Attn: Paul K. Schwartzberg, [paul.schwartzberg@usdoj.gov](mailto:paul.schwartzberg@usdoj.gov)).

/s/ Andrew V. Alfano  
Andrew V. Alfano